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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Pamela Brown, Individually, and as Special
Administratrix of the Estate of James
Brown,

Plaintiffs,

v.

United States of America,
Defendant.

Case No. 2:20-cv-01814-CDS-DJA

**Stipulation to Extend Remaining
Deadlines (Fourth Request)**

Pursuant to Local Rule 26-4 and Local Rule IA 6-1, the parties respectfully request
a ~~60~~³⁰-day extension of the remaining deadlines. This is the ~~third~~^{fourth} request for an extension of
time.

A. Discovery completed to date

This is a complex medical malpractice wrongful death case. The parties have
provided disclosures, exchanged written discovery, including numerous medical records,
and subpoenaed multiple third parties. The parties have deposed the plaintiff, other family
members of the decedent, and two of the medical providers who treated the decedent. The
deadlines for amendment and to add parties have passed. The parties have closely
cooperated to move discovery forward. The deposition of Dr. Ayat, a cardiologist who
treated the decedent was taken on April 18, 2022.

B. Remaining Discovery

The parties are nearing completion of fact witness depositions. Although the parties have exchanged a significant amount of written discovery, and have served numerous subpoenas, some further written discovery will be necessary. The main task remaining in discovery is disclosure of expert witnesses and reports, disclosing rebuttal experts and rebuttal reports, and conducting expert witness depositions.

C. Reasons for Requested Extension

It is Plaintiff counsel's understanding that one of his experts has encountered unexpected heavy clinical responsibilities associated with a Covid resurgence in California. It is Plaintiffs' counsel's understanding that this expert may have difficulty completing his Initial Expert Report pursuant to the current deadline for Initial Disclosure of Expert Reports. There have been difficulties communicating with this expert due to the expert's onerous clinical schedule due to the Covid pandemic.

Given the above, the parties are seeking this extension to allow sufficient time to complete the necessary discovery in this complex case. The parties have and will continue to cooperate in conducting discovery and are seeking this extension in good faith and without purpose of delay.

D. Proposed revised discovery schedule

	Current due date	Proposed due date
Discovery Cut-Off	August 22, 2022	September 22, 2022
Expert Disclosures	June 22, 2022	July 22, 2022
Rebuttal Expert Disclosures	July 22, 2022	August 22, 2022
Dispositive Motions	September 23, 2022	October 24, 2022
Pre-Trial Order	October 24, 2022	November 23, 2022

Respectfully submitted this 15th day of June 2022.

LAIRD LAW, PLLC

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 17, 2022